

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

LEON ALLEN, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

WENCO MANAGEMENT, LLC,

Defendant.

Case No. 1:23-CV-00103

Judge Solomon Oliver, Jr.

**DEFENDANT WENCO MANAGEMENT, LLC'S MOTION  
TO DISMISS PLAINTIFF'S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), defendant Wenco Management, LLC respectfully moves the Court to dismiss Plaintiff's Complaint for failure to state a claim upon which relief can be granted. The grounds for this Motion are set forth more fully in the attached memorandum in support.

Dated: January 25, 2023

Respectfully submitted,

/s/ Lisa M. Ghannoum

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### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing and all attached documents were filed electronically on January 25, 2023, and served by regular U.S. mail on all counsel of record at the address below.

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/s/ Lisa M. Ghannoum

Lisa M. Ghannoum